

EXHIBIT A

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: Valsartan Products Liability
Litigation**

**Civil Action No.
1:19-MD-02875-RBK-JS**

**DECLARATION OF MINFA WANG
PURSUANT TO 28 U.S.C. § 1746**

1. I am Vice President, Analytical Operation/QC of Princeton Pharmaceutical Inc. ("Princeton"). My office is located at 2002 Eastpark Blvd. Cranbury, NJ 08512. Through the course of my employment, I have become familiar with the companies that have maintained offices at 2002 and 2009 Eastpark Blvd. Cranbury, NJ 08512.
2. This declaration is made on the basis of my personal knowledge.
3. 2009 Eastpark Boulevard is a closed office building and is the former address of Huahai US Inc. ("Huahai"). Huahai now maintains an office at my address, 2002 Eastpark Blvd Cranbury, NJ 08512.
4. On February 6, 2019, a courier attempted to hand-deliver two envelopes addressed:

Zhejiang [sic] Huahai Pharmaceutical Co., Ltd.
2009 Eastpark Boulevard
Cranbury, NJ 08512
5. Zhejiang Huahai Pharmaceutical Co., Ltd. ("ZHP") is the parent company of Huahai, and a majority owner of Princeton.
6. When the courier arrived at my office at 2002 Eastpark Blvd, he asked me whether "the business" that was formerly at 2009 Eastpark Blvd. is now located at 2002 Eastpark

Blvd. I responded “yes” because, Huahai, formally located at 2009 Eastpark Blvd. is now located in the building where I work, 2002 Eastpark Blvd.

7. ZHP has never maintained and does not now maintain an office at either 2009 Eastpark Blvd. or at 2002 Eastpark Blvd.

8. ZHP’s offices, manufacturing facilities, and principal place of business are all located in the People’s Republic of China.

9. Based on my knowledge of the move by Huahai from 2009 Eastpark Blvd. to 2002 Eastpark Blvd., when I accepted the courier’s envelopes I believed him to be referring to Huahai, and I answered “yes” when he asked me if I was authorized to accept the envelopes for Huahai.

10. The courier never asked me if ZHP was located at either address, and he did not ask me if I was authorized to accept service for ZHP.

11. I did not discuss the organizational structure of ZHP or Huahai with the courier.

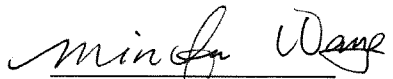
12. I did not tell the courier I was authorized to accept service on behalf of ZHP.

13. I am not employed by ZHP, nor am I an officer, managing agent or general agent for ZHP and have never been authorized to receive and accept service of process on its behalf.

14. To the best of my knowledge, my employer, Princeton, is not a managing agent or general agent for ZHP, and is not authorized to receive and accept service of process on its behalf.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: February 25, 2019


Minfa Wang, Declarant